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Attorneys for Defendant  
MARIELA PANGANIBAN

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:21-CR-32-TLN
Plaintiff,	)
vs.	) <b>STIPULATION AND ORDER TO CONTINUE</b>
MARIELA PANGANIBAN,	) <b>STATUS ON SENTENCING</b>
Defendant.	)
	) Date: October 28, 2021
	) Time: 10:00 A.M.
	) Judge: Hon. Troy L. Nunley

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney Matthew Thuesen, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Ms. Mariela Panganiban, that the status regarding sentencing, currently set for October 28, 2021 may be continued to **December 02, 2021 at 9:30 A.M.**

The parties specifically stipulate as follows:

- On September 12, 2021, the previously-assigned district judge, the Hon. Morrison C. England, signed an order of recusal, and this matter was reassigned to the Hon. Troy L. Nunley for all further proceedings, with all previously-set dates vacated. ECF No. 24. A minute order was issued later that day setting the status conference on sentencing for its currently-set date of October 28, 2021.
- By stipulation, the defense now moves to continue the status conference to

December 02, 2021.

3. Undersigned defense counsel was newly assigned this case in mid-July 2021. ECF No. 18. As such, she requires time to review the discovery in this matter and otherwise prepare for sentencing.
4. Defense counsel believes that failure to grant the requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
5. The government does not object to the continuance.
6. As this matter is post-plea, there are no Speedy Trial Act considerations.
7. Therefore, the parties respectfully request the Court to set this matter for a status regarding sentencing on December 02, 2021 at 9:30 A.M.

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: October 26, 2021

/s/ Christina Sinha  
CHRISTINA SINHA  
Assistant Federal Defender  
Attorneys for Defendant  
MARIELA PANGANIBAN

Date: October 26, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

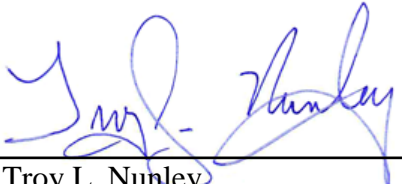
/s/ Matthew Thuesen  
Matthew Thuesen  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: October 26, 2021

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Troy L. Nunley  
United States District Judge